

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

02-13-07
04:59 PM

Pacific Gas and Electric Company (U 39-E), for approval of the 2006 – 2008 Energy Efficiency Programs and Budget.	Application 05-06-004 (Filed June 1, 2005)
Southern California Gas Company (U 904-G) for approval of Natural Gas Energy Efficiency Programs and Budgets for Years 2006 through 2008.	Application 05-06-011 (Filed June 1, 2005)
Southern California Edison Company (U 338-E), for Approval of its 2006 – 2008 Energy Efficiency Program Plans and associated Public Goods Charge (PGC) and Procurement Funding Requests.	Application 05-06-015 (Filed June 2, 2005)
San Diego Gas & Electric Company (U 902-E) for Approval of Electric and Natural Gas Energy Efficiency Programs and Budgets for Years 2006 through 2008.	Application 05-06-016 (Filed June 2, 2005)

**REQUEST OF THE UTILITY REFORM NETWORK
FOR AN AWARD OF COMPENSATION**

Hayley Goodson
Staff Attorney

The Utility Reform Network
711 Van Ness Avenue, Suite 350
San Francisco, CA 94102
Phone: (415) 929-8876
Fax: (415) 929-1132
E-mail: hayley@turn.org

February 13, 2007

REQUEST FOR AWARD OF COMPENSATION

Pursuant to §1801 et seq. of the Public Utilities (PU) Code and Article 17 of the Commission's Rules of Practice and Procedure, The Utility Reform Network (TURN) submits this request for award of compensation in the amount of \$58,162.91 for substantial contribution to Decision (D.) 05-09-043, D.05-11-011, and D.06-12-013, issued in this proceeding.¹

Under Rule 17.3 of the Commission's Rules of Practice and Procedure (herein after Rule 17.3) and Cal. Pub. Util. Code Section 1804(c), an intervenor may file a request for compensation either within 60 days after the issuance of a final order or decision in which an issue raised through the intervenor's participation is addressed, or within 60 days of the final decision or order closing the proceeding.² Consistent with this requirement, this request is being filed within 60 days of December 14, 2006, the date of issuance (mailing) of D.06-12-013, which closed the instant proceeding, A.05-06-004 et al.³

Section 1804(c) further requires that a compensation request include a detailed description of services and expenditures and a description of the customer's substantial contribution to the hearing or proceeding. In the following sections, TURN satisfies these requirements.

¹ This request for compensation addresses only TURN's participation in this proceeding that was independent of our Program Advisory Group (PAG) and Peer Review Group (PRG)-related work. TURN's PAG- and PRG-related work also contributed to D.05-09-043 and the Commission's disposition of post-D.05-09-043 Compliance Phase advice letters. However, pursuant to ALJ Gottstein's *Ruling Addressing Eligibility for Compensation Award of Utility Consumers' Action Network*, issued April 4, 2005, in R.01-08-028, TURN filed a request for compensation for our PAG and PRG-related work directed at the instant docket on June 15, 2006, in R.01-08-028. That request is pending. As is discussed later in this request, any PAG- or PRG-related hours or expenses not included in the pending request in R.01-08-028 have been excluded from this request, and may (consistent with the 2005 ruling) be included in a subsequent compensation request in R.06-04-010.

² See D.00-07-013.

³ TURN filed a timely Notice of Intent to Claim Compensation in A.05-06-004 et al. on July 13, 2005, demonstrating our customer status and financial eligibility. In a ruling dated November 10, 2005, ALJ Meg Gottstein found TURN eligible for compensation in this docket.

I. SUBSTANTIAL CONTRIBUTION

The Commission addressed the applications of Pacific Gas & Electric Company (PG&E), Southern California Gas Company (SoCalGas), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) for approval of their 2006-2008 energy efficiency programs and budgets in this consolidated docket. TURN's participation met the requirements for establishing a substantial contribution to the Commission's decisions covered by this request. TURN was an active party in each of the three phases of this proceeding: Phase 1, which resulted in D.05-09-043; Phase 2, which resulted in D.05-11-011; and the Compliance Phase, which disposed of utility advice letters filed pursuant to D.05-09-043.⁴ TURN attended the Prehearing Conference, filed comments and reply comments⁵ on the consolidated utility applications, comments on the utilities' requests for interim spending authorization and proposed Codes and Standards accounting, and participated very actively in the Case Management Process established by the Commission. Additionally, TURN filed comments and reply comments on the Phase 1 Draft Decision of ALJ Gottstein,⁶ comments on Joint Staff's Proposed EM&V Plans and Budgets in Phase 2, reply comments on the Phase 2 Draft Decision, and a Response to

⁴ See *Assigned Commissioner's Ruling and Scoping Memo*, Jun. 30, 2005, pp. 4-6 (identifying the issues to be addressed in Phase 1, Phase 2, and the Compliance Phase, and explaining that Phase 1 and Phase 2 issues would be resolved by Commission Decision, while Compliance Phase issues would be resolved by Commission Decision or Resolution). Despite the Commission's indication that Compliance Phase issues would be resolved by either Commission Decision or Resolution, the Commission resolved these issues by informal Staff disposition letters. For this reason, TURN discusses our Compliance Phase contributions in conjunction with Phase 1 and D.05-09-043, as the Compliance Phase occurred as part of the implementation of D.05-09-043.

⁵ TURN both filed reply comments on July 21, 2005, and also partially joined in the reply comments of the then-called Office of Ratepayer Advocates (ORA).

⁶ TURN both filed opening comments on the Phase 1 Draft Decision on September 6, 2005, and also opening comments jointly with DRA (then called ORA). TURN and DRA (then ORA) jointly filed reply comments on the Draft Decision.

PG&E's second Compliance Phase filing.⁷ Later, when SCE filed a petition for modification of D.05-09-043, TURN filed a response to SCE's petition, an additional response to SCE's supplemental filing, and comments and reply comments on the Proposed Decision of ALJ Gamson, which ultimately resulted in D.06-12-013.⁸

While TURN was not successful on every single argument that it presented in the proceeding, D.05-09-043, D.05-11-011 and D.06-12-013 clearly reflect the significant impact of TURN's advocacy. TURN's efforts in this proceeding, as reflected in these Commission orders, very clearly resulted in a "substantial contribution" as defined in Section 1802(i) of the PU Code:

'Substantial contribution' means that, in the judgment of the commission, the customer's presentation has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer. Where the customer's participation has resulted in a substantial contribution, even if the decision adopts that customer's contention or recommendations only in part, the commission may award the customer compensation for all reasonable advocate's fees, reasonable expert fees and other reasonable costs incurred by the customer in preparing or presenting that contention or recommendation.

The Commission has clarified in Rule 17.3 that "final order or decision" for purposes of intervenor compensation means "an order or decision that resolves an issue on which the customer believes it made a substantial contribution or the order or decision closing the proceeding." Thus, intervenor contributions to Commission decisions and Commission orders, such as formally adopted resolutions, would fall squarely within the purview of Section 1801(i) of the PU Code. Additionally, the Commission has awarded intervenor compensation for participation regarding advice letter compliance filings which did not result in a final

⁷ TURN filed this Response jointly with DRA (then called ORA).

⁸ TURN jointly prepared and filed all pleadings pertaining to SCE's Petition for Modification with DRA.

Commission decision or order.⁹

The Commission has elaborated on the statutory standard for “substantial contribution” as follows:

A party may make a substantial contribution to a decision in various ways. It may offer a factual or legal contention upon which the Commission relied in making a decision. Or it may advance a specific policy or procedural recommendation that the ALJ or Commission adopted. A substantial contribution includes evidence or argument that supports part of the decision, even if the Commission does not adopt a party's position in total. The Commission has provided compensation even when the position advanced by the intervenor is rejected.¹⁰

Similarly, the Commission has previously determined that an intervenor's contribution to a final decision may be supported by contributions to the ALJ's proposed decision, even where the Commission's final decision does not mirror the proposed decision on that issue.¹¹ Moreover, the Commission has awarded compensation where an intervenor's arguments, “though ultimately unsuccessful, enriched the Commission's deliberations and the record by encouraging debate over the full range of legal, policy and implementations issues associated with” the recommendations before the Commission.¹²

As described below, TURN made a substantial contribution by having a number of our recommendations adopted by the Commission in D.05-09-043, D.05-11-011, and D.06-12-013.

A. Contribution to D.05-09-043 and Post-D.05-09-043 Compliance Phase

In D.05-09-043, the Commission authorized 2006-2008 energy efficiency portfolio plans and funding levels for PG&E, SCE, SDG&E and SoCalGas (the utilities), and established a

⁹ See D.00-09-068, pp. 17-18.

¹⁰ D.99-08-006, 1999 Cal. PUC LEXIS 497, *3-4.

¹¹ D.99-11-006, pp. 9-10 (citing D.99-04-004 and D.96-08-023); D.01-06-063, pp. 6-7.

¹² D.06-02-016, pp. 9-10.

process for improving the accuracy and reliability of underlying data assumptions in the 2006-2008 portfolios, as well as for portfolio adjustments which might follow from the data updates or other near-term program performance indices. Additionally, the Commission provided direction as to how the Compliance Phase should proceed.

Commenting on the utilities' proposed portfolios, TURN warned that it was unclear whether the portfolios would meet the savings goals established by D.04-09-060, because the portfolios relied on unrealistic and outdated assumptions about lighting freeridership and measure retention. TURN noted that the program administrators quite likely over-forecasted lighting savings, which occupied a central role in the portfolios, and thus, because their total forecasted portfolio savings were already close to their goals, their ability to attain the goals might be in jeopardy.¹³ To increase the accuracy of forecasted portfolio performance, TURN recommended that the Commission immediately update the net-to-gross (NTG) inputs (which account for freeridership) using the best available data, and then require the utilities to update their projected 2006 savings based on the new net-to-gross inputs.¹⁴ TURN also recommended that the Commission prioritize near-term EM&V activities, targeted at net-to-gross inputs and other data input assumptions, and incorporate these activities into program years 2004-2005 EM&V studies where possible.¹⁵

The Commission agreed with TURN's concerns in D.05-09-043. The Commission explained,

We are less certain, however, that the proposed portfolios will meet or exceed the Commission's energy savings goals for 2006-2008. With respect to the energy (GWh and therm) savings associated with the portfolios, the risk that the

¹³ See TURN Comments on the Portfolio Plans, June 30, 2005, pp. 8-13.

¹⁴ See TURN Reply Comments and Comments on Requests for Interim Authorization, July 21, 2005, p. 8.

¹⁵ See TURN Reply Comments and Comments on Requests for Interim Authorization, July 21, 2005, p. 9.

portfolios will not meet these goals revolves around uncertainties in key input assumptions. These include, in particular, estimates of the number of program participants, the fraction of those likely to be free riders (reflected in NTGs) and the estimated useful lives associated with certain lighting measures.¹⁶

Moreover, the Commission stated, “In considering the concerns about the planning assumptions in this proceeding, we agree in principle with TecMarket Works, TURN, ORA and others that NTG ratios must be refined to reflect the findings from recent evaluation studies and appropriately mapped to the new generation of programs in 2006 and beyond.”¹⁷ While the Commission did not adopt TURN’s proposed process for addressing the uncertainty associated with the utilities’ savings forecast, the Commission nonetheless agreed that it needed more information from the utilities before it could authorize the final 2006-2008 portfolio plans during the Compliance Phase. Hence, the Commission ordered the utilities to include in their Compliance Phase filings sensitivity analyses “to assess whether the portfolio will still be cost-effective and meet the Commission’s energy goals if key parameters (e.g., NTG ratios and input assumptions for key measures such as lighting) are lower than expected after evaluation.”¹⁸ Additionally, the Commission agreed that refinements of NTG and other key input assumptions “over time, using a consistent set of EM&V protocols, will enable us to improve our ability to estimate the impacts of energy efficiency programs for both program planning and resource planning purposes.”¹⁹

TURN also recommended that the Commission clarify the meaning of the MW targets adopted by D.04-09-060 as soon as possible, to allow the Commission to assess whether the

¹⁶ D.05-09-043, *mimeo*, pp. 96-97.

¹⁷ D.05-09-043, *mimeo*, p. 98.

¹⁸ D.05-09-043, *mimeo*, pp. 99-100.

¹⁹ D.05-09-043, *mimeo*, p. 98.

proposed portfolios would likely meet the peak demand targets. TURN advocated the use of the “daily average” method of calculating peak demand, and recommended that the Commission require the utilities to recalculate and promptly distribute their projected portfolio MW demand impacts using this definition.²⁰ TURN explained that until the Commission clarified the meaning of “peak demand”, it would be difficult to evaluate whether the portfolios placed appropriate emphasis on critical peak savings.²¹

Both of these recommendations were adopted by ALJ Gottstein in her Phase 1 Draft Decision.²² Among other reasons for selecting the “daily average” peak savings as the common definition for projecting demand reductions associated with the portfolio plans, the Draft Decision noted:

Moreover, as TURN points out in its comments, this definition would be analytically compatible with the possible inclusion of a ‘super peak’ demand period to improve the valuation of critical peak period savings, should that approach be taken when we update avoided costs per today’s decision.²³

Next, the Draft Decision directed the utilities to “re-estimate the peak savings from their 2006-2008 portfolio plans using the common definition within 15 days from the effective date of this decision and distribute the results to their PRGs and the service list in this proceeding,” among other related things.²⁴ Finally, the Draft Decision explained that, by making this information available before the Compliance Phase third party solicitations would be evaluated, the Commission would “ensure that development of the final program plans will take into

²⁰ See TURN Reply Comments and Comments on Requests for Interim Authorization, July 21, 2005, p. 12.

²¹ See TURN Reply Comments and Comments on Requests for Interim Authorization, July 21, 2005, p. 13.

²² See Draft Decision of ALJ Gottstein (Phase 1 Issues), pp. 102-106.

²³ Draft Decision of ALJ Gottstein (Phase 1 Issues), p. 102.

²⁴ Draft Decision of ALJ Gottstein (Phase 1 Issues), pp. 103-104.

consideration the possible need for additional demand savings to meet the Commission's goals."²⁵

However, the Commission decided in D.05-09-043 that the definition of peak savings "require[d] further deliberation in coordination with updates to our avoided costs and E3 calculator refinements."²⁶ Deferring resolution of this issue to the "post-Compliance Phase updating process" in the avoided cost proceeding, R.04-04-025, the Commission noted that the utilities might ultimately "need to rebalance some of their program offerings and budget allocations based on these updates."²⁷

Additionally, TURN strongly advocated a "rebalancing" of the portfolios to reduce the reliance on lighting and increase the targeting of low load factor / high critical peak saving measures.²⁸ While the Commission declined to order such a "rebalancing," the Commission responded to TURN's concerns about deteriorating utility system load factors and strategic portfolio balance at length. The Commission explained,

The bottom line is this: Yes, we are concerned about the reported trends concerning increasing peak demands relative to baseload requirements on the utilities' systems, and we do want the utilities to identify and aggressively pursue the most cost-effective energy efficiency, demand-response and/or distributed generation options that can serve to improve system load factors. However, rather than require the utilities to arbitrarily "rebalance" their energy efficiency portfolios based on unresolvable disputes among parties over how much program funding should be focused on HVAC end-uses, we believe that the best way to ensure the optimal result over time is to: (1) clearly establish the parameters by which the utilities' portfolio performance in terms of peak load reductions will be evaluated, (2) properly value demand reductions that occur during critical peak periods for all peak reduction resource options, and (3) update our peak savings

²⁵ Draft Decision of ALJ Gottstein (Phase 1 Issues), p. 106.

²⁶ D.05-09-043, *mimeo*, p. 102.

²⁷ D.05-09-043, *mimeo*, p. 109.

²⁸ See TURN Comments on the Portfolio Plans, June 30, 2005, pp. 2-8; TURN and DRA Comments on Phase 1 Draft Decision, Sept. 6, 2005, p. 8; TURN and DRA Reply Comments on Phase 1 Draft Decision, September 12, 2005, p. 4.

goals for 2009 and beyond based on studies of peak savings potential, rather than historical program performance.²⁹

TURN respectfully submits that our showing regarding the extent to which the energy efficiency portfolios should target critical peak directly enhanced the Commission's deliberations and the record in this proceeding. TURN's arguments encouraged parties and the Commission to view the utilities' energy efficiency portfolios from the least-cost best-fit perspective used in supply side procurement planning, and assisted the Commission in developing policy tools to encourage optimal energy efficiency impacts on the attributes (and cost associated therewith) of total utility system demand.

The Commission also adopted several of TURN's recommended modifications to the Phase 1 Draft Decision of ALJ Gottstein. For instance, TURN recommended that the Commission require the utilities to make available for public review the underlying load shapes embedded in the E3 calculators, prior to the workshop on necessary E3 calculator refinements.³⁰ In D.05-09-043, the Commission ordered each utility "to make available the underlying load shape data used to develop the inputs to their respective E3 calculator model to all interested parties several days prior the workshop."³¹ TURN also recommended that the Commission address relatively simple and immediate E3 calculator refinements in the fall of 2005, with the remaining and more complex issues resolved in the first half of 2006. TURN suggested that more immediate issues, like new peak demand definition, correcting the calculation anomalies in the SPM c/e indicators, counting peak savings from measures with EUL greater than 2 years, and displaying the underlying load shapes by end use type or measure, could be addressed

²⁹ D.05-09-043, *mimeo*, pp. 106-107.

³⁰ See TURN Comments on Phase 1 Draft Decision, p. 1-2.

promptly.³² More complex issues, such as updates to avoided costs to reflect critical peak period values and the creation of a common E3 calculator for use by all implementers, could be next.³³ The Commission generally followed this approach in D.05-09-043.³⁴ Lastly, the Commission adopted TURN's proposed funds shifting procedures for review and / or approval of program incentive level changes.³⁵ The Commission explained, "We think the TURN/ORR proposal presented in their comments on the draft decision strikes an appropriate balance" between coordinating "incentive levels statewide" and providing the utilities with sufficient funds shifting flexibility.³⁶

TURN also significantly contributed to the Post-D.05-09-043 Compliance Phase,³⁷ where TURN's participation (outside of our role in the PG&E and SCE/SoCalGas PRGs) was limited to filing a response to PG&E's second Compliance Filing, Advice Letter 2704-G-A/2786-E-A, jointly with DRA. TURN urged the Commission to take steps to encourage effective competitively bid third-party programs and government partnerships in PG&E's 2006-2008 portfolio, noting with distress that "it appears likely that PG&E's partnership programs will not start until sometime in the third quarter of 2006, and we are not certain when the third party programs will commence."³⁸ Among the specific recommendations presented by TURN was

³¹ D.05-09-043, *mimeo*, pp. 110-111.

³² TURN and DRA Comments on Phase 1 Draft Decision, Sept. 6, 2005, pp. 9-10.

³³ TURN and DRA Comments on Phase 1 Draft Decision, Sept. 6, 2005, p. 9.

³⁴ See D.05-09-043, *mimeo*, pp. 111-112, 163-164.

³⁵ See TURN and DRA Comments on Phase 1 Draft Decision, Sept. 6, 2005, p. 7.

³⁶ D.05-09-043, *mimeo*, pp. 151-152.

³⁷ See D.05-09-043, *mimeo*, p. 7 ("Following today's decision, the compliance phase begins as the utilities complete their competitive bid solicitations and finalize their program plans for our consideration.").

³⁸ TURN and DRA Response to PG&E Advice Letter 2704-G-A/2786-E-A, May 8, 2006, p. 2.

that the Commission require PG&E to submit a report documenting the start-up data, ramp-up and full-level operation for all partnerships and third party programs, once all programs had commenced.³⁹ TURN also recommended that the Commission closely monitor PG&E's management of funding allocations among government partnerships, third-party programs, and PG&E's own core programs, as well as PG&E's administrative costs for the portfolio overall and partnerships specifically, and additionally provide further guidance about the relationship between utility administrators and their partners, and the role of partnerships in the portfolios.⁴⁰ Overall, TURN sought to ensure that the third party programs and partnership would have an opportunity to be successful, despite the extensive delays in contract signing.

While D.05-09-043 provided that "Compliance phase issues will be addressed either by Commission resolution, or by subsequent Commission decision in this proceeding, depending upon the PRG assessment of the utilities' bid selection process and final program plans," the Commission actually addressed Compliance Phase issues by informal staff disposition for all utilities.⁴¹ Energy Division disposed of PG&E's Compliance Phase advice letter filings on June 1, 2006. In response to the issues raised by TURN, Energy Division's disposition noted:

Staff is concerned about the issues raised with respect to PG&E's partnership programs, despite PG&E's responses. Staff believes these are important issues that go beyond the scope of Staff's disposition of the Advice Letter, but Staff strongly recommends the Commission to address more appropriately in R.06-04-010.⁴² (referring to the energy efficiency rulemaking)

Energy Division additionally stated, "Staff intends to raise these issues with the Assigned

³⁹ See Id., pp. 3-5.

⁴⁰ See Id., pp. 1-2.

⁴¹ D.05-09-043, *mimeo*, p. 18.

Commissioner and the Assigned Administrative Law Judge, and would strongly recommend they be addressed in R.06-04-010, as both PG&E and TURN/DRA have also suggested.”⁴³

Indeed, on July 7, 2006, the Assigned Commissioner in R.06-04-010 issued a ruling *Requesting Progress Reports From the Utilities on Their Third Party and Government Partnership Energy Efficiency Programs*. Assigned Commissioner Grueneich mirrored TURN’s concerns in explaining her ruling: “My goal is to have the third-party and government partnerships implemented as quickly and efficiency as possible and to minimize the negative impacts of the delay in contract signing on achieving the energy efficiency savings goals.”⁴⁴ As TURN’s prediction about delays had borne out, Commissioner Grueneich directed the utilities to “finalize negotiations with their statewide and local partners within 30 days after the issuance of this ruling” and require monthly progress reports for the duration of 2006.⁴⁵ She requested that the monthly reports document the dates when contracts are signed and programs are rolled out, and “explain how they [the utilities] will meet their savings goals while allowing their partners to fully implement their programs, given the delay in contract signing.”⁴⁶

As noted above, the Commission has previously awarded intervenor compensation for contributions to advice letter compliance filings flowing from Commission decisions, where no formal Commission Decision or Resolution issued.⁴⁷ In the instant case, TURN submits that our

⁴² Energy Division Disposition of PG&E AL 2704-G/2786-E & AL 2704-G-A/2786-E-A, June 1, 2006, p. 12.

⁴³ Id., p. 13.

⁴⁴ *Assigned Commissioner’s Ruling Requesting Progress Reports From the Utilities on Their Third Party and Government Partnership Energy Efficiency Programs*, R.06-04-010, Jul. 7, 2006, p. 1.

⁴⁵ Id.

⁴⁶ Id., p. 2.

⁴⁷ D.00-09-068, pp. 17-18; *see also* D.98-11-049 (granting compensation to Aglet for participation in the advice letter process).

contributions should be similarly compensated, despite that the Commission deviated from D.05-09-043 by resolving Post-D.05-09-043 Compliance Phase issues through informal Staff disposition rather than Resolution. TURN's showing clearly persuaded Energy Division to recommend Commission action pertaining to PG&E's government partnerships and third party programs, and Commissioner Grueneich's Assigned Commissioner's Ruling implemented one of TURN's recommendations.

B. Contribution to D.05-11-011

In D.05-11-011, the Commission authorized funding for energy efficiency evaluation, measurement and verification (EM&V) activities to be conducted by Energy Division and California Energy Commission Staff (Joint Staff) and the IOUs over the 2006-2008 program cycle. This decision approved with clarifications Joint Staff's recommended EM&V plans and associated budgets, upon which parties commented pursuant to ALJ Gottstein's August 30, 2005, ruling in this proceeding. In response to ALJ Gottstein's ruling, TURN filed comments on September 16, 2005. First, TURN recommended that Joint Staff's proposed budget be scaled back to increase the initial amount of unallocated JS EM&V budget, to reflect the fact that any number of EM&V related factors were currently in flux, including the EM&V protocols themselves.⁴⁸ TURN additionally recommended that Joint Staff allocate more of their budget to impact and program effects evaluation, and prioritize key end uses in the portfolio, including lighting, refrigeration and HVAC.⁴⁹ While the Commission did not adopt either of these prescriptive recommendations in D.05-11-011, it responded by emphasizing that Joint Staff would have ample funds shifting flexibility to make up for the limited amount of funds initially

⁴⁸ TURN Comments on EM&V Plans and Budgets, Sept. 16, 2005, p. 3.

⁴⁹ Id., pp. 3-4.

unallocated in its proposed budget, as well as to adjust funding to impact evaluations as needed throughout the program cycle.⁵⁰ Finally, TURN requested that the Commission ensure that ratepayers would not fund duplicate efforts by Joint Staff and the IOUs in the “Market Level Evaluations” category.⁵¹ In response to TURN’s concern (and that of then-called ORA), the Commission responded in D.05-11-011, “We also clarify our expectation that Joint Staff and the IOU program administrators will continue to closely coordinate their market evaluation studies to limit potential overlap and duplication.”⁵² Likewise, The Commission directed Joint Staff and the IOUs to “share EM&V plans and results with each other throughout the program cycle to ensure that their respective market evaluations complement each other effectively.”⁵³

C. Contribution to D.06-12-013

In D.06-12-013, the Commission modified D.05-09-043 to authorize Southern California Edison Company (SCE) to record up to \$14 million in its Procurement Energy Efficiency Balancing Account from existing unspent, uncommitted energy efficiency monies to fund “Palm Desert Project” expenditures during the 2006-2008 Energy Efficiency program cycle.⁵⁴ SCE had sought authority to spend \$18 million on this “demonstration partnership” between SCE, the City of Palm Desert, and the Energy Coalition. SCE also sought express authorization for the IOU administrators to use the advice letter process for shifting existing unspent, uncommitted

⁵⁰ See D.05-11-011, *mimeo*, p. 10 (“Moreover, as Joint Staff recognizes, the specific allocation of funding to impact evaluations will be adjusted as needed throughout the program cycle.”), and pp. 15, 26 (assuring parties and Joint Staff that Joint Staff would have ample flexibility to shift funds across study areas, among line items within the evaluation categories, and even to add and remove study category areas, with public input and technical expertise informing their management of EM&V funds.)

⁵¹ TURN Comments on EM&V Plans and Budgets, Sept. 16, 2005, pp. 4-5.

⁵² D.05-11-011, *mimeo*, p. 10.

⁵³ *Id.*, p. 11.

⁵⁴ D.06-12-013, Ordering Paragraph 1.

energy efficiency funds from past program cycles to the current portfolio budgets, a request granted by the Commission in D.06-12-013 with modification. TURN (jointly with DRA) opposed SCE's Petition on a number of grounds, including the size of the budget and duration of the program, SCE's flawed cost-effectiveness calculations, the program design and mix of measures, excessive administrative costs, and SCE's choice of the City of Palm Desert.⁵⁵ However, TURN supported the advice letter process proposed by SCE, but argued that the utility administrators should be required to first consult their PRGs before seeking to shift prior years' unspent, uncommitted funds.⁵⁶

The objections raised by TURN about the Palm Desert Project directly shaped the Commission's review of SCE's petition. Following TURN's response to SCE's petition, ALJ Gamson issued a ruling directing SCE to respond to a list of questions about the Palm Desert Project, which directly corresponded to the issues raised by TURN.⁵⁷ Then in D.06-12-013, the Commission agreed with many of the issues raised by TURN. First, the Commission agreed that the budget should be reduced, and removed 20% from SCE's requested \$18 million to account for the 20% reduction in the time period of the program.⁵⁸ Likewise, the Commission agreed that SCE had inflated the cost-effectiveness of the Palm Desert Project by failing to correctly account for free-ridership, and by failing to correct calculation anomalies, as directed by the

⁵⁵ See Response of DRA and TURN to SCE's Petition for Modification, Jul. 26, 2006; D.06-12-013, *mimeo*, pp. 7-13. Note that TURN coordinated every aspect of our participation in this portion of the instant proceeding with DRA, and we filed all pleadings jointly. TURN actively participated in developing jointly presented positions, so each joint position should be construed as TURN's own. The hours and expenses claimed by TURN in this request for compensation reflect the efficiency benefits of this collaboration, and contain only those hours and expenses incurred by TURN.

⁵⁶ See Response of DRA and TURN to SCE's Petition for Modification, Jul. 26, 2006, p. 24; D.06-12-013, *mimeo*, p. 24.

⁵⁷ See *ALJ's Ruling Seeking Further Information*, Aug. 21, 2006.

⁵⁸ See D.06-12-013, *mimeo*, pp. 13-14.

Commission in D.06-06-063.⁵⁹ Next, the Commission agreed that the inclusion of Thermal Energy Storage as a measure in the Palm Desert Project would be on a non-precedential, pilot basis only, because, as TURN pointed out, Thermal Energy Storage is not an energy efficiency measure.⁶⁰ The Commission also agreed with TURN that the \$1 million in administrative costs SCE had requested for the efforts of The Energy Coalition were unjustified, and accordingly reduced The Energy Coalition's Budget by 50%.⁶¹ Finally, the Commission adopted TURN's recommendation that the utility administrators be required to consult with their advisory groups before seeking to shift prior years' funds into the current portfolio budgets through the advice letter process.⁶²

The Commission also responded to TURN's comments and reply comments on the Proposed Decision of ALJ Gamson (PD) which preceded D.06-12-013. TURN caught two calculation errors in commenting on the PD, resulting in a more accurate and consistent Commission decision.⁶³ Likewise, the Commission rejected all of the changes to the PD advocated by the other commenting parties, SCE, The Energy Coalition and SoCalGas, as recommended by TURN in our reply comments on the PD.⁶⁴

⁵⁹ See D.06-12-013, *mimeo*, pp. 15-16.

⁶⁰ See *Id.*, pp. 18-19. On January 16, 2007, TURN and DRA filed an Application for Rehearing of D.06-12-013 on the limited issue of the decision's silence as to the treatment of impacts from Thermal Energy Storage as energy efficiency savings. TURN has excluded our hours and expenses related to preparing the Application for Rehearing from this Request for Compensation, but may separately seek compensation for those hours and expenses in a future request following the Commission's disposition of our Application for Rehearing.

⁶¹ See *Id.*, pp. 20-21.

⁶² See *Id.*, p. 24.

⁶³ See Comments of TURN and DRA on the Palm Desert Proposed Decision of ALJ Gamson, Dec. 4, 2006, p. 2; D.06-12-013, *mimeo*, p. 14, fn 15, and p. 21 (reflecting these corrections).

⁶⁴ See Reply Comments on TURN and DRA on the Palm Desert Proposed Decision of ALJ Gamson, December 11, 2006, pp. 2-5; D.06-12-013, *mimeo*, pp. 13-14 (Palm Desert Project duration and corresponding budget), p. 15 (net-to-gross ratio), pp. 20-21 (Energy Coalition budget).

D. Summary

TURN submits that our overall record of contributions in this case would have to be considered substantial by any reasonable measure. Thus, the Commission should conclude that TURN made a substantial contribution in this proceeding. Under these circumstances, the Commission should award TURN compensation for all of our reasonable advocate's fees, expert witness expenses, and other reasonable costs incurred in preparing or presenting our contentions and recommendations, pursuant to Section 1802(i).

**II. DUPLICATION OF SHOWING OF OTHER PARTIES
AND OVERALL BENEFITS OF PARTICIPATION**

A. No Reduction in Compensation for Duplication is Warranted

TURN's compensation in this proceeding should not be reduced for duplication of the showings of other parties. In a proceeding involving multiple participants, it is virtually impossible for TURN to completely avoid some duplication of the work of other parties. Moreover, the Commission has noted that duplication may be practically unavoidable in a proceeding such as this where many stakeholder groups are encouraged to participate.⁶⁵

In this case, TURN took all reasonable steps to keep such duplication to a minimum, and to ensure that when it did happen, our work served to complement and assist the showings of the

⁶⁵ See, i.e. D.96-08-040 (67 CPUC 2d 562, 575-576.X)(“[B]ecause of the extraordinary level of participation required of both parties and intervenors throughout these proceedings, we find that a reduction in the amount awarded to intervenors based on duplication of effort is unwarranted. Section 1803(b) requires that the awarding of fees to intervenors “be administered in a manner that encourages the effective and efficient participation of all groups that have a stake in the public utility regulation process.” Each of the intervenor groups clearly has a stake in the process of restructuring California’s electrical services industry and we are grateful for their participation in these proceedings. Moreover, we rely on them to continue their effective and efficient participation in our proceedings as we move forward with the many implementation tasks ahead. [footnote omitted][¶] In a broad, multi-issue proceeding such as this, we expect to see some duplication of contribution. This duplication does not diminish the value of that contribution to the Commission. In our view, to deduct from an award of reasonable fees in this case would not encourage the effective and efficient participation of all stakeholders in the spirit of § 1801.3(b).”)

other parties. TURN collaborated closely with DRA throughout this proceeding, jointly preparing and filing a number of pleadings. This coordination reduced the workload for both TURN and DRA, resulting in increased efficiency in both entities' utilization of scarce resources. The hours and expenses claimed in this request for compensation reflect only TURN's efforts where TURN and DRA jointly participated. TURN additionally sought consensus where possible with parties other than DRA, and otherwise sought to ensure that our efforts were coordinated with those of other parties to the extent feasible.

In summary, any incidental duplication that may have occurred here was more than offset by TURN's unique contribution to the proceeding. Under these circumstances, no reduction to our compensation due to duplication is warranted. Furthermore, given the policy changes to the "duplication standard" adopted by this Commission in D.03-03-031 in A.98-12-005 (upheld on rehearing in D.04-07-039), any reduction for duplication here would be entirely inappropriate.

B. Overall Benefits of Participation

In D.98-04-059, the Commission adopted a requirement that a customer must demonstrate that its participation was "productive," as that term is used in § 1801.3.⁶⁶ The Commission directed customers to demonstrate productivity by assigning a reasonable dollar value to the benefits of their participation to ratepayers. The Commission should treat this compensation request as it has treated similar past requests with regard to the difficulty of establishing specific monetary benefits associated with TURN's participation.⁶⁷ While it is

⁶⁶ D.98-04-059, pp., 31-33.

⁶⁷ See, *i.e.* D.99-12-005, pp. 6-7 (Compensation Decision in 1995 Storm Phase of PG&E GRC, A.97-12-020) and D.00-04-006, pp. 9-10 (Compensation Decision in Edison PBR Midterm Review, A.99-03-020) (recognizing the overall benefit of TURN's participation where that participation assisted the Commission in developing a record on which to assess the reasonableness of the utility's operations, and particularly its preparedness and performance in the future); D.00-05-022 (Compensation Decision in the Emergency Standards Proceeding) (awarding TURN \$92,000 in D.00-10-014 for our substantial contribution to the earlier decision, despite TURN's inability to assign a

possible to quantify some of the benefits of TURN's contribution to D.06-12-013, TURN cannot as easily identify precise monetary benefits to ratepayers from D.05-09-043 and D.05-11-011.

Because TURN's contributions to D.05-09-043 and D.05-11-011 were directed primarily at policy matters, TURN cannot identify precise monetary benefits to ratepayers from our participation (aside from the general customer net benefits attributable to the utilities 2006-2008 EE portfolios – forecasted at over \$2 billion over the life of the measures installed). However, the establishment of energy efficiency policies has a direct and lasting impact on customer rates. Energy efficiency investments yield demand side resources designed to displace more expensive supply side resource procurement, and TURN's efforts throughout this proceeding have focused on ensuring that the Commission's energy efficiency policies dramatically increase the amount of incremental electric and gas demand that will be met through energy efficiency investments in the next ten years as cost-effectively and strategically as possible. As the energy crisis demonstrates, procurement costs can be a major driver of utility outlays and retail rates. The astronomical rate increases of 2001 can be linked to the extraordinary costs of wholesale electricity. In the future, procurement expenditures may continue to represent the least predictable component of utility costs. Therefore, appropriate energy efficiency (and integrated resource planning) policies and prudent planning practices will be essential to maintaining both low and stable rates. TURN's contributions to this proceeding will assist the Commission in achieving its energy efficiency goals. Moreover, TURN's contributions will promote long-term rate stability, reduce risks to ratepayers and contribute to resource diversity that should help to mitigate the impact of future market dysfunction.

dollar value to the benefit of our participation in order to demonstrate "productivity." Interestingly, the Commission awarded compensation even though the emergency restoration standards may never come into play in the future, since they come into play only after a "major outage," which is defined as impacting more than 10% of a utility's customers. The contingent nature of the future standards did not cause the Commission to hesitate in awarding

On the other hand, two of TURN's contributions towards to D.06-12-013 produced more easily quantifiable ratepayer savings. As a direct result of TURN's advocacy (and that of DRA, with whom we participated jointly), the Commission reduced SCE's budget for the Palm Desert Project from \$18 million to \$14 million. The Commission first reduced the total budget by 20% (or \$3.6 million) in response to TURN's argument that the benefits and costs of the Project would be lower than presented by SCE due to the time period of the Project.⁶⁸ Next, the Commission was persuaded by TURN that SCE had failed to justify the \$1 million budget line item for The Energy Coalition. After reducing this amount by 20% to account for the shortened program duration, the Commission ordered an additional 50% reduction (or \$400,000) "to reduce unnecessary administrative duplication."⁶⁹ Thus, TURN's participation directly saved SCE's ratepayers \$4 million. The amount of intervenor compensation requested here is a very small fraction of \$4 million.

III. ITEMIZATION OF SERVICES AND EXPENDITURES

A. Summary

In this filing TURN is requesting compensation for all of the time that we reasonably devoted to in this proceeding, excluding all hours devoted to our participation in the PAG and PRG process. Likewise, TURN is requesting compensation for the full amount of expenses we incurred for our participation, other than those expenses related to our participation in the PAG and PRG process. As discussed above, TURN filed a request for compensation for our PAG and PRG-related work pertaining to issues in this proceeding on June 15, 2006, in R.01-08-028, as

TURN compensation.).

⁶⁸ D.06-12-013, *mimeo*, p. 14.

directed by ALJ Gottstein's *Ruling Addressing Eligibility for Compensation Award of Utility Consumers' Action Network*, issued April 4, 2005, in R.01-08-028.⁷⁰ No costs or expenses sought in this request were recovered from any grant or other outside source. The following is a summary of TURN's requested compensation.

Attorney Fees

Hayley Goodson	107.00	hours X	\$190.00	(2005) =	\$20,330.00
Hayley Goodson	0.50	hours X	\$95.00	(2005) =	\$47.50
Hayley Goodson	60.25	hours X	\$195.00	(2006) =	\$11,748.75
Hayley Goodson	21.25	hours X	\$97.50	(2007) =	\$2,071.88
Hayley Goodson Total					\$34,198.13
Marcel Hawiger	1.25	hours X	\$280.00	(2006) =	\$350.00
Marcel Hawiger Total					\$350.00
Attorney Subtotal					\$34,548.13

Expert Witness Costs (Hours Billed)

Cynthia K. Mitchell, Energy Economics, Inc.	152.5	hours X	\$140	(2005) =	\$21,350.00
Cynthia K. Mitchell, Energy Economics, Inc.	14.5	hours X	\$140	(2006) =	\$2,030.00
Cynthia K. Mitchell, Energy Economics, Inc. Total					\$23,380.00
Expert Witness Subtotal					\$23,380.00

Other Reasonable Costs

Legal Research (Lexis)	=	\$16.95
Meals	=	\$25.48
Photocopying expenses	=	\$172.00
Postage costs	=	\$6.01
Telephone expenses	=	\$14.34
Other Reasonable Costs Total	=	\$234.78

TOTAL = \$58,162.91

⁶⁹ Id., p. 21.

⁷⁰ See footnote 1, *supra*.

B. The Hours Claimed for TURN's Attorneys Are Reasonable.

During the period covered by this request for compensation, for the activities described herein, Hayley Goodson served as TURN's primary attorney in this proceeding. TURN staff attorney Marcel Hawiger also provided a very limited amount of assistance to Ms. Goodson in 2006. Ms. Goodson and Mr. Hawiger each maintained detailed contemporaneous time records indicating the number of hours devoted to this case. A daily listing of the specific tasks each performed in connection with this proceeding is set forth in Appendix A.

TURN also relied on outside expert witnesses Cynthia Mitchell to assist us in this work. Ms. Mitchell provided invaluable analysis on almost every issue that TURN addressed in the decisions covered by this compensation request. While no formal expert testimony has been served in this proceeding, TURN incorporated Ms. Mitchell's recommendations regarding energy efficiency program and portfolio design, reliability of utility energy savings forecasts and other data quality control issues, and EM&V funding and priorities. A daily listing of the specific tasks she performed in connection with TURN's work in this proceeding is set forth in Appendix B.

In preparing Appendices A and B, Ms. Goodson reviewed all of the recorded hours devoted to this proceeding and included only those that were reasonable for the underlying task. TURN submits that all of the hours included in this request are reasonable, and should be compensated in full.

C. TURN's Proposed Allocation By Issue Is Reasonable And Fair.

TURN has segregated our attorney and expert witness time by issue or activity where feasible, in accordance with the guidelines adopted in D.85-08-012. Of course, such allocation by issue or activity does not necessarily mean the award of compensation will vary by issue or

activity. The plain language of the intervenor compensation statute provides that full compensation may be warranted even where less than full success is achieved by the intervenor.⁷¹ And the Commission has often awarded full compensation even where the intervenor's positions were not adopted in full, especially in proceedings with a broad scope.⁷² In the present case TURN achieved a degree of overall success that was generally comparable to the level achieved in many of those prior cases. Therefore it is appropriate for us to seek, and for the Commission to award, compensation for 100% of the hours TURN devoted to this proceeding (and includes in this request for compensation). However, TURN is also mindful of the Commission's desire to see an allocation of hours by issue even where the intervenor is seeking compensation for all of those hours. The following discussion describes TURN's allocation of work activities in this proceeding.

The Commission specified in D.85-08-012 three different categories of work activities that allow for differing degrees of issue-by-issue allocation. TURN was able to allocate a portion of the hours covered by this Request for Compensation to specific issue areas, the first category described in D.85-08-012. TURN has identified the following major issue and activity categories for purposes of allocating hours:

⁷¹ §1802(i) and §1803.

⁷² For example, in D.98-04-028, the Commission awarded TURN full compensation for all of the time we devoted to both phases of the CTC proceeding, even though TURN did not prevail on all of the issues that we raised in the case. The Commission applied the same principle in the compensation decision in the SoCal Gas PBR proceeding (A.95-06-002), finding the hours for which TURN sought compensation reasonable despite the fact that we did not prevail on every issue we addressed in that proceeding. D.98-08-016, pp. 6, 12. The Commission has also appropriately awarded TURN the full amount of hours claimed even though our substantial contribution was made in the course of unsuccessfully opposing adoption of a settlement agreement. D.00-02-008, pp. 4-7, 10 (Edison OOR A.97-06-021).

“Ph1”	Hours TURN devoted to participation in Phase 1 of this proceeding, which resulted in D.05-09-043, excluding those hours TURN devoted to preparing the Case Management Statement required by ALJ Gottstein in her June 8, 2005. (See “CMS” below).
“CMS”	Hours TURN devoted to participation in the extensive case management process, which resulted in the Case Management Statement filed jointly by the utilities on July 18, 2005. In an attempt to narrow the areas of dispute, TURN actively participated in the case management negotiation process, as well as the drafting and editing of the Case Management Statement. ⁷³ The Commission relied heavily upon the Case Management Statement in D.05-09-043. ⁷⁴
“Ph2”	Hours TURN devoted to participation in Phase 2 of this proceeding, which resulted in D.05-11-011. Hours designated “Ph2” pertained to the EM&V budgets and plans for the 2006-2008 program cycle.
“PhCmpl”	Hours TURN devoted to participation in the Post-D.05-09-043 Compliance Phase of this proceeding.
“PetMod”	Hours TURN devoted to responding to SCE’s Petition for Modification of D.05-09-043 to authorize the Palm Desert Project, which resulted in D.06-12-013.

The remainder of hours falls into the second category contemplated in D.85-08-012, corresponding to more general work for which allocation by issue or activity is almost impossible. The entries in this category represent work that is fundamental to active participation in the case. TURN’s general initial preparation time (while it may vary along with the scope of the case) can cover our review of an even wider range of issues than we ultimately addressed; such review work cannot be broken down by issue. Similarly, some tasks are fundamental to active participation, and the amount of time they require does not vary by the

⁷³ As the Commission noted in D.05-09-043, “Through the development of the Case Management Statement (CMS), this constructive exchange continued after the utility applications and parties’ comments on those applications were filed.” D.05-09-043, *mimeo*, pp. 2-3.

⁷⁴ See D.05-09-043, *mimeo*, pp. 51-84, Section 6 (“Case Management Statement and Positions of the Parties”).

number of issues upon which TURN participated (or prevailed). Given the extent of TURN's substantial contribution in this proceeding, TURN has requested compensation for all of these hours, designated "GP" in Appendices A and B.

Finally, TURN also seeks compensation at half the usual hourly rate for the hours devoted to the preparation of this compensation request (designated as "Comp" in the appendix and totaling 21.75 hours). This reduction is consistent with the Commission's practice of generally treating compensation requests as a pleading not requiring an attorney's drafting efforts.

In conclusion, TURN has proposed a reasonable means of complying with the Commission's guidelines on allocation of time. TURN submits that all of the hours claimed were reasonably and efficiently expended and should be fully compensated.

D. The Hourly Rates Requested for TURN's Attorneys And Expert Witness Are Reasonable and Should Be Adopted.

The work covered by this Request for Compensation includes hours from 2005, 2006 and 2007. The rates requested for 2005 work have all been approved in previous decisions awarding intervenor compensation. Where the Commission has not already adopted a 2006 rate for one of TURN's advocates, TURN is seeking a 3% increase, consistent with D.07-01-009 (issued in R.06-08-019). For purposes of this request for compensation, TURN is seeking no increase to 2007 rates (but reserves the right to seek such increases in future requests covering 2007 work). TURN is not presenting specific information regarding our attorneys' training and experience in order to justify the requested hourly rates. We understand that such information is unnecessary

where, as here, we are seeking already-approved rates for work performed in 2005, and the escalation adopted for 2006 hours.⁷⁵

a) Hayley Goodson

TURN requests an hourly rate of \$190 for work Ms. Goodson performed in 2005. This is the same rate the Commission approved for her work in 2004 in D.05-11-031. We request a 3% increase for work performed in 2006, producing an hourly rate of \$195 when rounded to the nearest \$5 increment.⁷⁶ TURN also requests that the Commission apply this rate of \$195 for the limited number of hours in 2007 Ms. Goodson devoted to preparation of this request for compensation (which TURN has discounted by 50%, as noted above). TURN reserves the right to seek a higher rate for Ms. Goodson's 2007 work consistent with D.07-01-019 in a future compensation request.

b) Marcel Hawiger

TURN requests an hourly rate of \$280 for work Mr. Hawiger performed in 2006, the same rate the Commission approved for his work in 2006 in D.06-10-018.

c) Cynthia K. Mitchell of Energy Economics, Inc.

The consulting costs associated with Ms. Mitchell's work reflect the actual billing rate charged to TURN. Ms. Mitchell billed TURN at an hourly rate of \$140 for her work in 2005 and 2006. The Commission previously approved an hourly rate of \$140 for Ms. Mitchell's work in 2005 in D.06-02-016, issued in R.01-08-028.

⁷⁵ Should the Commission determine that such a showing is necessary for any of the attorney rates included here, it should provide an opportunity to supplement the compensation request to present such information.

⁷⁶ TURN requested a different 2006 rate for Ms. Goodson in the pending Request for Compensation we filed in R.01-08-028 (Energy Efficiency) on June 15, 2006. The rate requested there (\$200) reflected a 4% increase to the approved 2005 rate. Subsequent to the filing of that request, the Commission issued D.07-01-019, adopting a 3% increase for 2006 hourly rates.

E. TURN's Expenses Are Reasonable And Should Be Compensated in Full.

The miscellaneous expenses of \$234.78 listed in the summary presented above are reasonable in magnitude and were necessary for TURN's efforts in this case. They consist primarily of photocopying expenses that relate exclusively to the preparation and distribution of TURN's comments and other pleadings. TURN submits that our costs are all reasonable, and should be compensated in full.

IV. ALLOCATION AMONG UTILITIES

Since this proceeding involved issues common to all four of the major California gas and electric utilities, TURN suggests that any award be apportioned among Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company and Southern California Gas Company based on CPUC-jurisdictional sales or revenues for the 2006 calendar year.

V. CONCLUSION

In the foregoing sections, TURN has described our substantial contribution to D.05-09-043, D.05-11-011, and D.06-12-013, issued by the Commission in this proceeding. We have also provided a detailed itemization of our costs of participation, and demonstrated the reasonableness of our requested hourly rates. TURN has met all of the requirements of Sections 1801 et seq. of the Public Utilities Code, and therefore requests an award of compensation in the amount of \$58,162.91, plus interest if a decision is not issued within 75 days of today, in accordance with Section 1804(e) of the PU Code.

February 13, 2007

Respectfully submitted,

By:

A handwritten signature in black ink, appearing to read 'Hayley Goodson', written over a horizontal line.

Hayley Goodson
Staff Attorney

THE UTILITY REFORM NETWORK

711 Van Ness Avenue, Suite 350

San Francisco, CA 94102

Phone: (415) 929-8876

Fax: (415) 929-1132

E-mail: hayley@turn.org

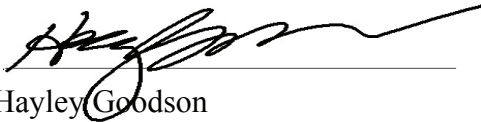
VERIFICATION

I, Hayley Goodson, am an attorney of record for THE UTILITY REFORM NETWORK in this proceeding and am authorized to make this verification on the organization's behalf. The statements in the foregoing document are true of my own knowledge, except for those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I am making this verification on TURN'S behalf because, as the lead attorney in the proceeding, I have unique personal knowledge of certain facts stated in the foregoing document.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 13, 2007, at San Francisco, California.


Hayley Goodson
Staff Attorney

Intervenor Compensation Claim Summary

Contribution Decision(s):	D.05-09-043, D.05-11-011, D.06-12-013
Proceeding(s):	A.05-06-004 et al. (Energy Efficiency)
Intervenor:	The Utility Reform Network (TURN)
Claim Date:	February 13, 2007
Total Amount of Claim:	\$58,517.28

Advocate Information⁷⁷

First Name	Last Name	Type⁷⁸	Hourly Fee Requested	Year⁷⁹	Relevant Education or Degree/ Year Attained/ Experience
Hayley	Goodson	(1)	\$190	2005	J.D. 2003, 3+ years plus paralegal and law clerk experience before CPUC
Hayley	Goodson	(1)	195	2006	
Hayley	Goodson	(1)	195	2007	
Marcel	Hawiger	(1)	280	2006	J.D. 1993, 8 years experience before CPUC
Cynthia K.	Mitchell	(2)	140	2005	M.S. in Economics 1981; 30+ years in energy policy, including 9 years as chief economist for the Nevada Attorney General's Bureau of Consumer Protection, and expert witness experience in PUC proceedings in 12 states and D.C.
Cynthia K.	Mitchell	(2)	140	2006	

⁷⁷ By this we mean each advocate (attorney, expert, paralegal, etc.) who participated on your behalf.

⁷⁸ Describe the type of work and/or specialization the advocate performed for you. For example, (1) Attorney, (2) Economist, (3) Policy Expert, (4) Engineering, (5) Computer Modeling, (6) Scientist, (7) Accountant, (8) Financial Analyst, (9) Paralegal, (10) Other (describe).

⁷⁹ List each year separately for each witness; you do not need to repeat the information related to education and experience for each year unless additional education or experience was attained that year that supports a claimed rate.

APPENDIX A

ATTORNEY CONTEMPORANEOUS TIME SHEETS

Date	Attorney	Activity	Description	Time Spent
<u>Classification: Open</u>				
6/8/2005	HG	GP	read ALJ ruling and calendar schedule	0.50
6/10/2005	HG	Ph1	discuss Codes and Stnds workshop w/ ORA	0.25
6/13/2005	HG	GP	read PG&E's application, PRG report	5.00
6/13/2005	HG	Ph1	review Codes and Stnd cmts fm CKM	0.50
6/20/2005	HG	GP	discuss PHC w/ C. Tam, ORA	0.50
6/21/2005	HG	GP	prep for PHC	2.00
6/22/2005	HG	GP	prep for PHC (2.25); discuss w/ ORA (0.25)	2.50
6/22/2005	HG	GP	attend PHC	5.00
6/28/2005	HG	Ph1	discuss cmts on IOU apps w/ CKM, CCSF	1.25
6/29/2005	HG	Ph1	rsch, draft comments on IOU apps; review CKM analysis	8.00
6/30/2005	HG	Ph1	draft cmts on IOU apps; discuss w/ CKM; edit	3.00
7/5/2005	HG	GP	read ALJ Ruling re: CARE motion to intervene	0.25
7/5/2005	HG	Ph1	read cmts on IOU apps; correspondence re: cmts	2.00
7/5/2005	HG	Ph1	read Joint IOU C&S report	1.25
7/6/2005	HG	CMS	corresp. w/ CKM re: CMS, opening ctms	1.25
7/7/2005	HG	Ph1	review C&S correspondence for cmts on IOU report (1.25); discuss w/ ORA, CKM and review ORA draft cmts	2.75
7/12/2005	HG	Comp	draft NOI	0.50
7/12/2005	HG	CMS	discuss CMS meeting w/ CKM	0.25
7/14/2005	HG	CMS	CMS correspond; follow-up email w/ CKM	2.50
7/15/2005	HG	CMS	discuss CMS w/ CKM; edit and review correspond re CMS	3.25
7/18/2005	HG	Ph1	read CKM notes for reply cmts on IOU apps; discuss process, possible coordination w/ ORA	3.00
7/19/2005	HG	Ph1	read filed CMS, IOU apps for interim authorization; discuss reply cmts w/ CCSF	3.25
7/20/2005	HG	Ph1	read op cmts, notes; rsch for reply cmts; edit CKM draft and discuss w/ CKM	7.00
7/20/2005	HG	Ph1	review ORA draft reply cmts; discuss w/ CKM and edit	1.25
7/21/2005	HG	Ph1	draft reply cmts on IOU apps, TMW report, C&S proposals and IOU interim auth requests	8.00
7/25/2005	HG	Ph1	discuss amendment to reply cmts w/ Bob; email ALJ Gottstein	0.50
8/17/2005	HG	Ph1	begin reading phase 1 DD; notes for cmts	1.50
8/18/2005	HG	Ph1	discuss DD w/ CKM, notes	1.00
8/21/2005	HG	Ph1	continue reading DD, notes	1.75
8/23/2005	HG	Ph1	discuss PY 06-08 portfolio process w/ CCSF	2.00
8/24/2005	HG	Ph1	discuss ph 1 DD w/ CKM, MH	0.75
8/26/2005	HG	Ph1	review DD, notes, PAG/PRG correspond in prep for cmts on DD	2.00
8/29/2005	HG	Ph1	cont prep for cmts on DD; corresp w/ CKM, ORA and CCSF re: cmts on DD	5.25
8/30/2005	HG	Ph1	review correspond related to DD issues, and discuss cmts on DD w/ CKM	3.25
8/31/2005	HG	Ph1	correspond w/ CKM re cmts on DD; review, edit ORA draft	3.50
9/1/2005	HG	Ph1	read CKM draft cmts on phase 1 DD, notes	0.50
9/5/2005	HG	Ph1	review CKM draft op cmts on DD, edit, discuss w/ CKM	2.00
9/6/2005	HG	Ph1	draft, edit cmts on DD; discuss w/ CKM	2.25
9/7/2005	HG	Ph1	discuss errata to cmts on DD w/ MH, MF, and draft	0.50
9/16/2005	HG	Ph2	discuss EMV plans and budgets w/ CKM; draft, edit op cmts	3.00
9/21/2005	HG	Ph2	read op cmts on EM&V plans and budgets	2.00
9/22/2005	HG	Ph2	continue reading op cmts on EM&V plans and budgets; review CKM notes for reply cmts -- determine reply not necessary	2.00
9/22/2005	HG	Ph1	read escutia version of phase 1 DD	1.25
9/23/2005	HG	Ph2	read parties' reply cmts re: EM&V plans and budgets	1.00
9/23/2005	HG	Ph1	discuss phase 1 final decision w/ BF, CKM	1.00

Date	Attorney	Activity	Description	Time Spent
11/2/2005	HG	Ph2	review CKM notes, ORA draft re: EM&V 2006-08 budgets/plans DD	0.50
11/7/2005	HG	Ph2	read EM&V DD	0.75
11/11/2005	HG	Ph2	read op cmts on EM&V DD; begin reply cmts	2.50
11/14/2005	HG	Ph2	finalize draft reply cmts on EM&V budgets/plans DD; CKM edits	1.00
11/18/2005	HG	Ph2	read agenda DD re: EM&V budgets, plans	0.25
11/23/2005	HG	Ph1	read SDG&E's AL re: On Bill Financing	0.25
11/28/2005	HG	Ph1	discuss SCG OBF AL w/ CKM	0.25
1/10/2006	HG	PhCmpl	rsch GO-96A requirements for responses to advice letters; discuss SCE compliance advice letter w/ CKM and options re: what to do about her remaining concerns	1.00
1/31/2006	HG	PhCmpl	read WEM Protest to SCE's compliance advice letter	0.25
2/9/2006	HG	PhCmpl	read SCE's response to WEM's protest of AL 1955-E	0.25
2/17/2006	HG	PhCmpl	read portions of PG&E EE compliance filing	1.25
3/7/2006	HG	PhCmpl	read ALJ ruling re: PG&E motion to bifurcate compliance filing	0.25
3/14/2006	HG	PhCmpl	read add'l cmts on PG&E's compliance AL	0.50
3/20/2006	HG	PhCmpl	read PG&E's 3/16 reply to cmts on AL 2704-G/2786-E (compliance filing)	0.25
3/28/2006	HG	PhCmpl	conf call w/ CKM, C. Cox re PG&E LGP issues; discuss strategy w/ Mike	1.00
4/10/2006	HG	PhCmpl	rsch for TURN response to PG&E compliance filing, part 2; discuss w/ CKM	0.75
4/11/2006	HG	PhCmpl	discuss next steps w/ CKM, DRA; notes for TURN response to advice filing	1.00
4/18/2006	HG	PhCmpl	read PG&E 4/17 AL; discuss response to AL w/ CKM, DRA	0.50
4/19/2006	HG	PhCmpl	emails w/ CKM, DRA re meeting on AL response, ongoing strategy in PY 2006-08	0.50
4/21/2006	HG	PhCmpl	read email correspondence re LGPs	0.50
4/24/2006	HG	PhCmpl	rsch, notes for response to PG&E's AL 2704-G-A/2786-E-A	3.75
4/24/2006	HG	PhCmpl	read ED disposition of SCE compliance AL 1955-E; email CKM	0.50
4/25/2006	HG	PhCmpl	read recent PG&E, SCE AL re EE funding changes / rsch for response to PG&E compliance filing	1.75
4/26/2006	HG	PhCmpl	discuss response to PG&E compliance filing w/ CKM, Marcel, C. Cox; being drafting response to AL	4.25
4/27/2006	HG	PhCmpl	finish draft, notes for C. Cox, CKM re response to PG&E compliance AL	1.25
5/3/2006	HG	PhCmpl	discuss response to PG&E compliance filing w/ C. Cox	0.50
5/5/2006	HG	PhCmpl	review correspondence fm CKM, C. Cox re response to PG&E's compliance AL	0.50
5/7/2006	HG	PhCmpl	rsch, draft response to PG&E's compliance AL; email CKM, DRA	9.00
5/8/2006	HG	PhCmpl	discuss edits w/ CKM, C. Cox, D. Lee, Marcel, response to PG&E's compliance AL; finalize document	6.00
5/15/2006	HG	PhCmpl	read PG&E reply to TURN/DRA response to compliance AL	0.25
6/2/2006	HG	PhCmpl	read ED's disposition of PG&E's compliance AL	0.25
7/11/2006	HG	PetMod	read SCE PetMOD D05-09-03 (Pam Desert); notes; review CKM, c Cox (DRA) notes	1.25
7/20/2006	HG	PetMod	discuss response to SCE Palm Desert PetMod D.05-09-043 with DRA	0.25
7/24/2006	HG	PetMod	read DRA's draft response; comments to DRA	0.50
7/26/2006	HG	PetMod	review final draft DRA / TURN response	0.50
8/18/2006	HG	PetMod	read ruling re SCE Palm Desert PetMod, notes	0.25
8/22/2006	HG	PetMod	correspond w/ DRA, CKM re SCE response, status	0.75
8/23/2006	HG	PetMod	discuss errata to TURN/DRA response w/ CKM, DRA	0.25
9/6/2006	HG	PetMod	read emails fm CKM, DRA re SCE's Palm Desert proposal	0.25

2/13/2007
3:03 PM

A.05-06-004 Attorney Total Hours

Page 3

Date	Attorney	Activity	Description	Time Spent	
9/13/2006	HG	PetMod	read SCE's response to ALJ Gamson's questions; review first draft of TURN/DRA reply	2.00	
9/14/2006	HG	PetMod	rsch, draft, edit resp to SCE's resp re Palm Desert; discuss data issues w/ CKM; email ALJ Gamson re amendment; call SCE	6.75	
9/15/2006	HG	PetMod	discuss CFL data question w/ M. Montoya/SCE, CKM; more edits to Palm Desert draft; email to D. Lee/DRA	4.25	
9/18/2006	HG	PetMod	read emails re Palm Desert, review CKM edits to TURN/DRA response draft	0.25	
9/19/2006	HG	PetMod	discuss CFL issue w/ D. Lee, CKM, review DL edits	1.00	
9/21/2006	HG	PetMod	read local govt response to SCE's Palm Desert responses to ALJ questions; read UC/CSU letter to ALJ Gamson re Palm Desert	0.25	
12/2/2006	HG	PetMod	finish draft of cmts on Palm Desert PD; email to DRA	0.75	
12/4/2006	HG	PetMod	email Cheryl (DRA) re filing tomorrow	0.25	
12/5/2006	HG	PetMod	discuss draft w/ DRA, incorporate edits, finalize	0.75	
12/6/2006	HG	PetMod	read op cmts on Palm Desert, notes; discuss reply w/ DRA	2.25	
12/9/2006	HG	PetMod	email DRA, talk w/ D. Lee re reply cmts on Palm Desert PD	0.25	
12/12/2006	HG	PetMod	read, edit DRA draft reply cmts; discuss issues w/ CKM, DRA, finalize; read SCE's reply cmts	1.25	
12/16/2006	HG	PetMod	read Palm Desert final decision; email CKM, C. Cox (DRA)	0.25	
2/5/2007	HG	Comp	Research; Prep for Comp Request	2.50	
2/6/2007	HG	Comp	Research; Draft Comp Request	2.50	
2/8/2007	HG	Comp	Research; Draft Comp Request	5.75	
2/9/2007	HG	Comp	Research; Draft Comp Request	2.00	
2/11/2007	HG	Comp	Research; Draft Comp Request	1.00	
2/12/2007	HG	Comp	Research; Draft Comp Request	4.75	
2/13/2007	HG	Comp	Finalize Comp Request	2.75	
Total: HG				189.00	
4/26/2006	MH	PhCmpl	Mtg w/ Hayley re ratemaking responding to PG&E compliance filing	0.50	
5/8/2006	MH	PhCmpl	Research re ratemaking of PPP surcharge related to PG&E compliance filing	0.75	
Total: MH				1.25	
Total: Open				190.25	
Grand Total				190.25	

APPENDIX B

CONSULTANT TIME SHEETS

Date	Attorney	Activity	Description	Time Spent
<u>Classification: Open</u>				
6/4/2005	C Mitchell	Ph1	review TechMktWorks report	3.50
6/23/2005	C Mitchell	Ph1	analysis for JBS Energy and TURN opening comments June 30th re. achieved vs reported	1.00
6/25/2005	C Mitchell	GP	review PHC transcript, related documents	2.00
6/27/2005	C Mitchell	Ph1	continue work draft comments	7.50
6/28/2005	C Mitchell	Ph1	continue work draft comments	2.50
6/29/2005	C Mitchell	Ph1	continue work draft comments	10.00
6/30/2005	C Mitchell	Ph1	final comments comments	6.50
7/1/2005	C Mitchell	Ph1	review opening comments	0.50
7/3/2005	C Mitchell	Ph1	review opening comments	0.50
7/4/2005	C Mitchell	Ph1	review opening comments	1.25
7/5/2005	C Mitchell	Ph1	review Codes&Standards June 30th report	2.00
7/6/2005	C Mitchell	Ph1	analysis for reply comments: IOUs' system load factor data; other materials	3.50
7/6/2005	C Mitchell	CMS	draft TURN proposed CMS agreement	2.50
7/7/2005	C Mitchell	Ph1	codes and standards email correspondance; review draft ORA comments; discussion Hayley	2.00
7/7/2005	C Mitchell	CMS	conf call SCE re TURN proposed agreement	0.50
7/7/2005	C Mitchell	CMS	conf call ORA, NRDC re. stwd programs	1.00
7/7/2005	C Mitchell	CMS	SCE/SCG conf call case mgt statement; emails SCE re. follow-up to CMS meeting	3.00
7/8/2005	C Mitchell	CMS	draft agreement for TURN and SCE re. HVAC	2.00
7/8/2005	C Mitchell	CMS	CMS meeting	3.00
7/10/2005	C Mitchell	CMS	review EM&V order for Tues 7/12 stwd CMS; other documents; prepare notes	0.75
7/11/2005	C Mitchell	CMS	San Diego statewide CMS meeting	6.00
7/12/2005	C Mitchell	CMS	San Diego statewide CMS meeting	4.00
7/12/2005	C Mitchell	CMS	review draft CMS; rework, edits, circulate	2.50
7/12/2005	C Mitchell	CMS	review final distributed PG&E CMS	0.50
7/12/2005	C Mitchell	CMS	review SCE response; circulate Hayley/TURN; review Hayley response; resubmit to SCE	1.50
7/13/2005	C Mitchell	CMS	continue review draft CMS; rework, edits, circulate	1.25
7/13/2005	C Mitchell	CMS	review Energy Goals Decision re. NTG ratios; work with SCE on possible agreement -- Marian Brown -- discussions, emails	2.00
7/14/2005	C Mitchell	CMS	review draft CMS; rework, edits, circulate	1.50
7/14/2005	C Mitchell	Ph1	begin draft reply comments; review ORA 1st draft, comments to TURN/Hayley; comments back to ORA	2.75
7/15/2005	C Mitchell	CMS	review final distributed statewide CMS	2.25
7/18/2005	C Mitchell	CMS	review distributed CMS revision #1: attachments	1.50
7/19/2005	C Mitchell	Ph1	draft reply comments; discussions CCSF, TURN/Hayley; review ORA final draft, comments to TURN	4.00
7/19/2005	C Mitchell	CMS	review distributed CMS revision #2: attachments	0.50
7/20/2005	C Mitchell	Ph1	finalize reply comments	5.00
7/20/2005	C Mitchell	CMS	review final distributed SCE CMS	0.50
8/17/2005	C Mitchell	Ph1	review draft decision	0.75
8/19/2005	C Mitchell	Ph1	review draft decision	0.50
8/24/2005	C Mitchell	Ph1	review draft decision	1.00
8/29/2005	C Mitchell	Ph1	discussions DD, C Tam/ORA; discussion Marcus, J. Hirsch; more DD review; re-review C&S report	6.00
8/30/2005	C Mitchell	Ph1	emails/discussions C Tam/ORA, Jeff Hirsch; Hayley/TURN; review & comment ORA draft opening comments	4.75
8/31/2005	C Mitchell	Ph1	draft comments ORA; draft comments TURN	5.00
9/1/2005	C Mitchell	Ph1	draft TURN opening comments	6.00

Date	Attorney	Activity	Description	Time Spent
9/2/2005	C Mitchell	Ph1	draft TURN opening comments; discussion J.Nahigian, JBS; Jeff Hirsch	5.00
9/3/2005	C Mitchell	Ph1	edits TURN opening comments	0.50
9/5/2005	C Mitchell	Ph1	edits TURN opening comments	2.00
9/6/2005	C Mitchell	Ph2	review ALJ ruling EM&V protocol issues	0.75
9/6/2005	C Mitchell	Ph1	finalize TURN comments, review other parties opening comments	2.00
9/7/2005	C Mitchell	Ph1	review opening comments	0.75
9/7/2005	C Mitchell	Ph2	review Joint Staff and IOUs' Proposals	0.25
9/8/2005	C Mitchell	Ph1	discussion A. Kelly CCSF, C. Tam ORA, C. Cox ORA; reply comments; draft reply comments	2.50
9/8/2005	C Mitchell	Ph2	review Joint Staff and IOUs' Proposals	0.50
9/9/2005	C Mitchell	Ph1	review opening comments, comment notes to Hayley; notes, discussion J. Hirsch; conf call J. Hirsch, C. Tam ORA; draft text Hayley discussion Hayley	6.50
9/12/2005	C Mitchell	Ph1	review ORA-TURN final reply comment; email changes C. Tam, ORA	0.50
9/13/2005	C Mitchell	Ph1	review reply comments	1.00
9/14/2005	C Mitchell	Ph2	review Joint Staff and IOUs' Proposals; draft comments; discussion C. Tam, ORA; emails H. Goodson TURN and ORA	6.00
9/15/2005	C Mitchell	Ph2	draft comments; discussion J. Hirsch; emails D. Wang NRDC, C. Tam ORA	4.50
9/21/2005	C Mitchell	Ph2	review comments, notes for draft reply comments	1.50
9/29/2005	C Mitchell	Ph1	review final decision	0.50
9/30/2005	C Mitchell	Ph2	review reply comments	0.50
10/24/2005	C Mitchell	Ph2	review DD JS budgets/plans; discussion ORA re. opening comments	0.50
10/26/2005	C Mitchell	Ph2	review and comment on ORA draft opening comments re. ALJ DD on JS/ED budgets and plans	0.50
10/30/2005	C Mitchell	Ph2	review DD JS budgets/plans; skim attachments	0.25
11/2/2005	C Mitchell	Ph2	final review C Tam ORA draft opening comments DD re. JS EM&V budgets/plans	0.25
11/13/2005	C Mitchell	Ph2	review comments on JS EM&V budgets/plans DD of ORA, WEM, SCE, PG&E	0.25
11/14/2005	C Mitchell	Ph2	review TURN draft reply comments H Goodson	0.25
5/3/2006	C Mitchell	PhCmpl	draft TURN-DRA comments PG&E Compliance Advice Letter; discussions C Cox DRA	3.00
5/4/2006	C Mitchell	PhCmpl	draft TURN-DRA comments PG&E Compliance Advice Letter; data tables	4.00
5/5/2006	C Mitchell	PhCmpl	draft TURN-DRA comments PG&E Compliance Advice Letter; data tables; review PG&E post-San Ramone LGP materials	4.50
5/8/2006	C Mitchell	PhCmpl	review Hayley final draft	0.50
10/3/2006	C Mitchell	PetMod	discussion C Cox DRA Palm Desert TURN-DRA reply comments; review SCE reply comment s	0.50
11/14/2006	C Mitchell	PetMod	review Palm Desert DD; discussion Hayley re comments on decision	0.50
11/21/2006	C Mitchell	PetMod	discussion C Cox re Palm Desert DD	0.25
12/4/2006	C Mitchell	PetMod	review C Cox DRA notes re Palm Desert DD; discussion C Cox	0.25
12/5/2006	C Mitchell	PetMod	comments re Palm Desert PD; discussion C Cox	0.50
12/11/2006	C Mitchell	PetMod	reply comments Palm Desert PD	0.50

Total: C Mitchell

167.00

2/13/2007
3:06 PM

A.05-06-004 Consultants Total Hours

Date	Attorney	Activity	Description	Time Spent	
Total: Open				167.00	
Grand Total				167.00	

APPENDIX C

DIRECT EXPENSES

2/13/2007
3:09 PM

A.05-06-004 Expenses

Page 1

Date	Activity	Description	Billed
<u>Activity: \$Copies</u>			
6/30/2005	\$Copies	Comments on the PY '06-'08 EEPP; 14cc x 17pp	\$47.60
7/13/2005	\$Copies	NOI; 11cc x 8pp	\$17.60
7/21/2005	\$Copies	Reply Comments and Comments on Requests for Interim Auth.; 14cc x 18pp	\$50.40
9/6/2005	\$Copies	Comments on Ph. 1 DD of ALJ Gott.; 10cc x 6pp	\$12.00
9/8/2005	\$Copies	Errata to Comments filed 9/6/05; 10cc x 5pp	\$10.00
9/16/2005	\$Copies	Comments on Gottstein Ruling; 11cc x 7pp	\$15.40
11/14/2005	\$Copies	Reply Cmmts. On Gottstein Ph2 DD; 8cc x 5pp	\$8.00
5/8/2006	\$Copies	Response to AL; 5cc x 11pp	\$11.00
Total: \$Copies			\$172.00
<u>Activity: \$Lexis Research</u>			
11/30/2005	\$Lexis Research	Lexis Nexis November Invoice	\$16.95
Total: \$Lexis Research			\$16.95
<u>Activity: \$Meals</u>			
4/26/2006	\$Meals	Lunch meeting w/CKM, C. Cox (DRA), Jeanne Clinton re: partnerships	\$16.00
7/11/2006	\$Meals	Dinner meeting w/CKM, C. Cox (DRA) re: SCE's Petition Mod. D.05-09-043 (Palm Desert)	\$9.48
Total: \$Meals			\$25.48
<u>Activity: \$Phone</u>			
8/15/2005	\$Phone	Sprint Invoice; \$7.33	\$7.33
9/15/2005	\$Phone	Sprint Invoice; \$4.04	\$4.04
10/15/2005	\$Phone	Sprint Invoice; \$1.99	\$1.99
11/15/2005	\$Phone	Sprint Invoice; \$0.98	\$0.98
Total: \$Phone			\$14.34
<u>Activity: \$Postage</u>			
6/30/2005	\$Postage	Comments on the PY '06-'08 EEPP; 1cc x \$1.08	\$1.08
7/13/2005	\$Postage	NOI; 1cc x \$0.60	\$0.60
7/21/2005	\$Postage	Reply Comments and Comments on Requests for Interim Auth.; 1cc x \$1.06	\$1.06
9/6/2005	\$Postage	Comments on Ph. 1 DD of ALJ Gott.; 1cc x \$.60	\$0.60
9/8/2005	\$Postage	Errata to Comments filed 9/6/05; 1cc x \$.60	\$0.60
9/16/2005	\$Postage	Comments on Gottstein Ruling; 2cc x \$.60	\$1.20
5/8/2006	\$Postage	Response to AL; 1cc x \$0.87	\$0.87
Total: \$Postage			\$6.01
Grand Total			\$234.78

CERTIFICATE OF SERVICE

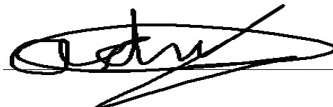
I, Cory Oberdorfer, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

I served the attached:

**REQUEST OF THE UTILITY REFORM NETWORK
FOR AN AWARD OF COMPENSATION**

by sending said document by electronic mail to each of the parties on the attached Service List **A.05-06-004**.

Executed this February 13, 2007, in San Francisco, California.

A handwritten signature in black ink, appearing to read 'Cory', with a large, sweeping horizontal stroke underneath.

Cory Oberdorfer
TURN Administrative Assistant
coryo@turn.org

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

Proceeding: A0506004 - PG&E - FOR APPROVAL

Filer: PACIFIC GAS AND ELECTRIC COMPANY (U 39-E)

List Name: LIST

Last changed: January 25, 2007

[Download the Comma-delimited File](#)

[About Comma-delimited Files](#)

[Back to Service Lists Index](#)

Appearance

DONALD GILLIGAN
ATTORNEY AT LAW
NATIONAL ASSOCIATION OF ENERGY SERVICE
1 POST OFFICE SQUARE
SHARON, MA 02067

RICHARD M. ESTEVES
SESCO, INC.
77 YACHT CLUB DRIVE, SUITE 1000
LAKE HOPATCONG, NJ 07849

CYNTHIA MITCHELL
ENERGY ECONOMICS, INC.
530 COLGATE COURT
RENO, NV 89503

RANDALL W. KEEN
ATTORNEY AT LAW
MANATT PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BLVD.
LOS ANGELES, CA 90064

MICHAEL J. GIBBS
ICF CONSULTING
14724 VENTURA BLVD., NO. 1001
SHERMAN OAKS, CA 91403

JANET S. COMBS
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

LARRY R. COPE
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

CARLOS PENA
SOUTHERN CALIFORNIA GAS COMPANY
101 ASH STREET, HQ-13D
SAN DIEGO, CA 92101

VICKI L. THOMPSON
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET
SAN DIEGO, CA 92101

DONALD C. LIDDELL, PC
DOUGLAS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103

WILLIAM E. POWERS
POWERS ENGINEERING
4452 PARK BLVD., STE. 209
SAN DIEGO, CA 92116

JOY C. YAMAGATA
REGULATORY MANAGER
SAN DIEGO GAS & ELECTRIC/SOCALGAS
8330 CENTURY PARK COURT, CP 32 D
SAN DIEGO, CA 92123

HAYLEY GOODSON
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

JEANNE M. SOLE
DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM. 234
SAN FRANCISCO, CA 94102

MARZIA ZAFAR
SOUTHERN CALIFORNIA GAS COMPANY/SDG&E
601 VAN NESS AVENUE, SUITE 2060
SAN FRANCISCO, CA 94102

CHRISTINE S. TAM
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LAURA J. TUDISCO
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5032
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

AUDREY CHANG
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104

RICHARD H. COUNIHAN
MANAGING DIRECTOR-CALIFORNIA
ECOS CONSULTING
433 CALIFORNIA STREET, SUITE 630
SAN FRANCISCO, CA 94104

CHONDA J. NWAMU
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105

WALTER MCGUIRE
EFFICIENCY PARTNERSHIP
2183 UNION STREET
SAN FRANCISCO, CA 94123

CALIFORNIA FOR RENEWABLE ENERGY, INC.
RESIDENT, BAYVIEW HUNTERS POINT
24 HARBOR ROAD
SAN FRANCISCO, CA 94124

LYNNE BROWN
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
24 HARBOR ROAD
SAN FRANCISCO, CA 94124

FRANK DIAZ
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO, CA 94177

JOSEPHINE WU
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177

DAVE CLARK
NAESCO
28436 SATELLITE STREET
HAYWARD, CA 94545

STEVEN R. SHALLENBERGER
SYNERGY COMPANIES
28436 SATELLITE STREET
HAYWARD, CA 94545

GERALD L. LAHR
ABAG
101 EIGHTH STREET
OAKLAND, CA 94607

ROBERT L. KNIGHT
BEVILACQUA-KNIGHT INC
1000 BROADWAY, SUITE 410
OAKLAND, CA 94607

JODY S. LONDON
JODY LONDON CONSULTING
PO BOX 3629
OAKLAND, CA 94609

JOSHUA HARRIS
LAW OFFICES OF STEPHAN C. VOLKER
436 14TH STREET, SUITE 1300
OAKLAND, CA 94612

PATTY AVERY
PROCTOR ENGINEERING GROUP
418 MISSION AVENUE
SAN RAFAEL, CA 94901

BARBARA GEORGE
WOMEN'S ENERGY MATTERS
PO BOX 548
FAIRFAX, CA 94978-0548

MAHLON ALDRIDGE
ECOLOGY ACTION, INC.
PO BOX 1188
SANTA CRUZ, CA 95061

HANK RYAN
SMALL BUSINESS CALIFORNIA
325 30TH AVENUE
SANTA CRUZ, CA 95062

MICHAEL E. BOYD
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
5439 SOQUEL DRIVE
SOQUEL, CA 95073

MIKE HODGSON
CONSOL
7407 TAM OSHANTER DRIVE
STOCKTON, CA 95210

ROBERT SARVEY
TREASURER CARE
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
501 W. GRANTLINE RD
TRACY, CA 95376

JOHN C. GABRIELLI
GABRIELLI LAW OFFICE
430 D STREET
DAVIS, CA 95616

MARSHALL B. HUNT
VALLEY ENERGY EFFICEINCY CORP
509 4TH STREET, SUITE A
DAVIS, CA 95616

SHAWN SMALLWOOD, PH.D.
109 LUZ PLACE
DAVIS, CA 95616

JOHN GOULD
ATTORNEY AT LAW
5737 SW 18TH DRIVE
PORTLAND, OR 97239

TOM ECKHART
CAL – UCONS, INC.
10612 NE 46TH STREET
KIRKLAND, WA 98033

STEPHEN F. HALL
STEPHEN F. HALL AND ASSOCIATES
11-5651 LACKNER CRESCENT
RICHMOND, BC V7E 6E8
CANADA

Information Only

MONICA J. NEVIUS
CONSORTIUM FOR ENERGY EFFICIENCY
98 NORTH WASHINGTON ST., STE. 101
BOSTON, MA 02114-1918

TOM MAULDIN
NEXUS MARKET RESEARCH
147 BRENTWOOD STREET
PORTLAND, ME 04103

AMELIA GULKIS
ENSAVE ENERGY PERFORMANCE, INC.
65 MILLER STREET, SUITE 105
RICHMOND, VT 05477

STEVE FAUST
ENSAVE ENERGY PERFORMANCE, INC.
65 MILLET STREET, SUITE 105
RICHMOND, VT 05477

MARK BOWEN
VICE PRESIDENT, BUSINESS DEVELOPMENT
ASPEN SYSTEMS CORPORATION

DEREK GREENAUER
D & R INTERNATIONAL, LTD.
1300 SPRING STREET, SUITE 500

2277 RESEARCH BOULEVARD, MS 4T
ROCKVILLE, MD 20850

SILVER SPRING, MD 20910

MARCELO GUEVARA
1300 SPRING STREET, SUITE 500
SILVER SPRING, MD 20910

NICK HALL
TECMARKET WORKS
165 WEST NETHERWOOD ROAD, 2/F, SUITE A
OREGON, WI 53575

HUGH YAO
SOUTHERN CALIFORNIA GAS COMPANY
555 W. 5TH ST, GT22G2
LOS ANGELES, CA 90013

JACKI BACHARACH
EXECUTIVE DIRECTOR
SOUTH BAY CITIES COUNCIL OF GOVERNMENTS
5033 ROCKVALLEY ROAD
RANCHO PALOS VERDES, CA 90275

TOM HAMILTON
MANAGING PARTNER
ENERGY CONCIERGE SERVICES
321 MESA LILA RD
GLENDALE, CA 91208

LESLIE NARDONI
ICF CONSULTING
14724 VENTURA BLVD. STE 1001
SHERMAN OAKS, CA 91403

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

DAVID R. HINMAN
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

DON ARAMBULA
SOUTHERN CALIFORNIA EDISON
2131 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

MARIAN BROWN
SOUTHERN CALIFORNIA EDISON
2131 WALNUT GROVE AVE., 3RD FLOOR, B7
ROSEMEAD, CA 91770

SCOTT J. ANDERS
RESEARCH/ADMINISTRATIVE DIRECTOR
UNIVERSITY OF SAN DIEGO SCHOOL OF LAW
5998 ALCALA PARK
SAN DIEGO, CA 92110

ANDREW MCALLISTER
SAN DIEGO REGIONAL ENERGY OFFICE
8690 BALBOA AVE., SUITE 100
SAN DIEGO, CA 92123

IRENE STILLINGS
EXECUTIVE DIRECTOR
SAN DIEGO REGIONAL ENERGY
8520 TECH WAY, SUITE 110

JENNIFER PORTER
POLICY ANALYST
SAN DIEGO REGIONAL ENERGY OFFICE
8690 BALBOA AVENUE

SAN DIEGO, CA 92123

SAN DIEGO, CA 92123

SEPHRA A. NINOW
RESEARCH ASSISTANT
SAN DIEGO REGIONAL ENERGY OFFICE
8690 BALBOA AVENUE, SUITE 100
SAN DIEGO, CA 92123

KURT J. KAMMERER
EXECUTIVE DIRECTOR
SAN DIEGO REGIONAL ENERGY OFFICE
PO BOX 60738
SAN DIEGO, CA 92166-8738

JONATHAN BATY
ENERGY CONTROLS & CONCEPTS
1758 ORANGE TREE LANE
REDLANS, CA 92374

STEPHEN GUTHRIE
ENERPATH
1758 ORANGE TREET LANE
REDLANDS, CA 92374

TED FLANIGAN
ECOMOTION - THE POWER OF THE INCREMENT
1537 BARRANCA PARKWAY, SUITE F-104
IRVINE, CA 92618

JEFF HIRSCH
JAMES J. HIRSCH & ASSOCIATES
12185 PRESILLA ROAD
CAMARILLO, CA 93012-9243

PETER CANESSA
CALIFORNIA STATE UNIVERSITY, FRESNO
665 ASILO
ARROYO GRANDE, CA 93420

CHRIS KING
C/O EMETER CORP.
CALIFORNIA CONSUMER EMPOWERMENT ALLIANCE
ONE TWIN DOLPHIN DRIVE
REDWOOD CITY, CA 94065

ANN KELLY
DEPARTMENT OF THE ENVIRONMENT
CITY AND COUNTY OF SAN FRANCISCO
11 GROVE STREET
SAN FRANCISCO, CA 94102

BRUCE FOSTER
VICE PRESIDENT
SOUTHERN CALIFORNIA EDISON COMPANY
601 VAN NESS AVENUE, STE. 2040
SAN FRANCISCO, CA 94102

CAL BROOMHEAD
DEPT OF ENVIRONMENT, ENERGY SECTION
CITY AND COUNTY OF SAN FRANCISCO
11 GROVE STREET
SAN FRANCISCO, CA 94102

DANIELLE DOWERS
SAN FRANCISC PUBLIC UTILITIES COMMISSION
1155 MARKET STREET 4TH FLOOR
SAN FRANCISCO, CA 94103

DAN ADLER
DIRECTOR, TECH AND POLICY DEVELOPMENT
CALIFORNIA CLEAN ENERGY FUND
582 MARKET ST., SUITE 1015
SAN FRANCISCO, CA 94104

DEVRA WANG
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104

ERIC WANLESS
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104

KAREN TERRANOVA
ALCANTAR & KAHL
120 MONTGOMERY ST., STE. 2200
SAN FRANCISCO, CA 94104

SHERYL CARTER
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104

CARL DUISBERG
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B9A
SAN FRANCISCO, CA 94105

GAIL L. SLOCUM
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO, CA 94105

SHILPA RAMALYA
77 BEALE STREET, ROOM 981
SAN FRANCISCO, CA 94105

TERRY M. FRY
NEXANT, INC.
101 SECOND STREET, 10TH FLOOR
SAN FRANCISCO, CA 94105

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVE.
SAN FRANCISCO, CA 94110-1431

ERIC LOUNSBURY
ICF CONSULTING
60 BROADWAY
SAN FRANCISCO, CA 94111

CHRISTINE HAMMER
SUSTAINABLE DESIGN RESOURCES
3168 WASHINGTON ST., NO. 6
SAN FRANCISCO, CA 94115

SHAUN ELLIS
2183 UNION STREET
SAN FRANCISCO, CA 94123

WILLIAM C. MILLER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000
SAN FRANCISCO, CA 94177

MARY SUTTER
EQUIPOISE CONSULTING INC.
2415 ROOSEVELT DRIVE
ALAMEDA, CA 94501-6238

JOHN KOTOWSKI
GLOBAL ENERGY PARTNERS
3569 MT. DIABLO BLVD., STE 200
LAFAYETTE, CA 94549

PATRICIA THOMPSON
SUMMIT BLUE CONSULTING
1766 LACASSIE AVE. SUITE 103
WALNUT CREEK, CA 94596

PHILIPPE AUCLAIR
11 RUSSELL COURT
WALNUT CREEK, CA 94598

MRW & ASSOCIATES, INC.
1814 FRANKLIN STREET, SUITE 720
OAKLAND, CA 94612

EILEEN PARKER
QUANTUM CONSULTING
2030 ADDISON STREET
BERKELEY, CA 94704

JOHN CAVALLI
QUANTUM CONSULTING, INC.
2030 ADDISON ST. 410
BERKELEY, CA 94704

JEANNE CLINTON
2232 WARD STREET
BERKELEY, CA 94705

CRAIG TYLER
TYLER & ASSOCIATES
2760 SHASTA ROAD
BERKELEY, CA 94708

EDWARD VINE
LAWRENCE BERKELEY NATIONAL LABORATORY
BUILDING 90-4000
BERKELEY, CA 94720

PHILIP SISSON
SISSON AND ASSOCIATES
42 MOODY COURT
SAN RAFAEL, CA 94901

CARL PECHMAN
POWER ECONOMICS
901 CENTER STREET
SANTA CRUZ, CA 95060

KENNY SWAIN
POWER ECONOMICS
901 CENTER STREET
SANTA CRUZ, CA 95060

MARY TUCKER
CITY OF SAN JOSE
ENVIRONMENTAL SERVICES
200 EAST SANTA CLARA ST., 10TH FLOOR
SAN JOSE, CA 95113-1905

THOMAS P. CONLON
PRESIDENT
GEOPRAXIS
PO BOX 5
SONOMA, CA 95476-0005

BILL KNOX
VALLEY ENERGY EFFICIENCY CORP.
509 4TH STREET, SUITE A
DAVIS, CA 95616

ERIN RANSLOW
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078

ANDY BROWN
ELLISON, SCHNEIDER & HARRIS
2015 H STREET
SACRAMENTO, CA 95814

BRUCE MCLAUGHLIN
ATTORNEY AT LAW
BRAUN & BLAISING P.C.
915 L STREET, SUITE 1420
SACRAMENTO, CA 95814

DAN GEIS
AGRICULTURAL ENERGY CONSUMERS ASSO.
925 L STREET, SUITE 800
SACRAMENTO, CA 95814

KATHERINE COBARRUBIA
AGRICULTURAL ENERGY CONSUMERS ASSOC.
925 L STREET, SUITE 800
SACRAMENTO, CA 95814

LYNN HAUG
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95816

KARI DOHN
GCC ROSE&KINDEL(ON BEHALF OF CONSOL)
915 L STREET, SUITE 1210
SACRAMENTO, CA 95818

LAURA ROOKE
SR. PROJECT MANAGER
PORTLAND GENERAL ELECTRIC
121 SW SALMON ST.,
PORTLAND, OR 97204

State Service

PETER LAI
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

ARIANA MERLINO
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
1350 FRONT ST., STATE BLDG. ROOM 4006
SAN DIEGO, CA 92101

JACK BURKE
SAN DIEGO REGIONAL ENERGY OFFICE
8690 BALBOA AVE., SUITE 100
SAN DIEGO, CA 92123

ANDREW SCHWARTZ
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CHERYL COX
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH

CHRISTOPHER R VILLARREAL
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF STRATEGIC PLANNING

ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DAVID M. GAMSON
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5019
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DIANA L. LEE
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

GEORGE S. TAGNIPES
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MEG GOTTSTEIN
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 2106
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MICHAEL WHEELER
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NORA Y. GATCHALIAN
CALIF PUBLIC UTILITIES COMMISSION
RATEPAYER REPRESENTATION BRANCH
AREA 3-C
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

THOMAS ROBERTS
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
ROOM 4205
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TIM G. DREW
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ZENAIDA G. TAPAWAN-CONWAY
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MEG GOTTSTEIN
ADMINISTRATIVE LAW JUDGE
PO BOX 210/21496 NATIONAL STREET
VOLCANO, CA 95689

GARY KLEIN
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814

MICHAEL MESSENGER
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET
SACRAMENTO, CA 95814

SYLVIA L. BENDER
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-22
SACRAMENTO, CA 95814

LORRAINE WHITE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 39
SACRAMENTO, CA 95814-5504

[Top of Page](#)

[Back to INDEX OF SERVICE LISTS](#)